

**UNITED STATES COURT OF APPEALS  
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

GIFFORDS,

Plaintiff-Appellee,

v.

FEDERAL ELECTION  
COMMISSION

Defendant-Appellee,

NATIONAL RIFLE ASSOCIATION  
OF AMERICA, NATIONAL RIFLE  
ASSOCIATION OF AMERICA  
POLITICAL VICTORY FUND,

Movants-Appellants.

Case No. 1:25-5188

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**APPELLANTS THE NATIONAL RIFLE ASSOCIATION  
OF AMERICA AND NATIONAL RIFLE ASSOCIATION  
OF AMERICA POLITICAL VICTORY FUND’S  
UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE BRIEF**

Appellants the National Rifle Association of America and National Rifle Association of America Political Victory Fund (collectively, “NRA”) respectfully request that the Court extend the deadline for Appellant NRA’s opening brief by three weeks, to January 13, 2026, with corresponding extensions to the remainder of the deadlines in the briefing schedule for this matter. Appellee Giffords consents and Appellee Federal Election Commission does not oppose this request.

Appellant NRA seeks a three-week extension due to counsel's significant commitments in other time-sensitive proceedings. On December 3, 2025, the Michigan Court of Claims issued an order directing undersigned counsel to file supplemental briefs in a longstanding matter no later than December 17, 2025. *See Republican National Committee, et al., v. Jocelyn Benson et al.*, 24-000148-MZ (Mich. Ct. Cl. Dec. 3, 2025). Moreover, Appellant NRA's other counsel has briefing on dispositive motions due December 10, 2025, *see Camel Energy, Inc. v. United States et al.*, 25-00230 (U.S. CIT), and a discovery deadline of December 26, 2025, *see HQS Automotive International, Inc., v. Sanhua International Inc.*, 25-cv-11627 (E.D. Mich.). Finally, undersigned counsel will be out of the country for more than a week later in December.

In light of counsel's time-sensitive commitments and for good cause shown, Appellant NRA respectfully requests under Circuit Rule 28(e) that the Court extend the deadline to file its opening brief by three weeks, from December 23, 2025, to January 13, 2026, and correspondingly extend the deadline for Amicus Curiae for Appellants' Brief from December 30, 2025, to January 20, 2026, for Appellee Giffords and Appellee Federal Election Commission to file their briefs from January 29, 2026, to February 19, 2026, and for Appellant NRA's reply brief from February 19, 2026, to March 12, 2026.

Dated: December 8, 2025

Respectfully Submitted,

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/s/ Robert L. Avers

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*Attorneys for Appellants the  
National Rifle Association of  
America & the National Rifle  
Association of America Political  
Victory Fund*

## **CERTIFICATE OF COMPLIANCE**

Pursuant to Fed. R. App. P. 32(g), Appellants National Rifle Association of America and National Rifle Association of America Political Victory Fund certify that its filed Unopposed Motion for Extension of Time to File Brief complies with Fed. R. App. P. 27(d)(2)'s word limit because it contains 286 words.

Appellants National Rifle Association of America and National Rifle Association of America Political Victory Fund further certify that the Unopposed Motion for Extension of Time to File Brief complies with Fed. R. App. P. 32(a)(5) and the type-style requirements of Fed. R. App. P. 32(a)(6) because it was prepared in a proportionally spaced typeface using Microsoft Word in 14 pt Times New Roman font.

/s/ Robert L. Avers

Robert L. Avers

## **CERTIFICATE OF SERVICE**

The undersigned certifies that, on this 8th day of December 2025, I filed the foregoing document using this Court's Appellate CM/ECF system, which effectuated service on all parties.

/s/ Robert L. Avers

Robert L. Avers